REMARKS/ARGUMENTS

Receipt of the Office action dated February 6, 2004 is hereby acknowledged. In that action the Examiner: 1) objected to the drawings; 2) rejected claims 32-39 as allegedly claiming subject matter not enable by the specification; 3) rejected claims 8, 9 and 32-39 as allegedly indefinite; and 4) rejected all the claims as allegedly obvious over Christentsen (U.S. Pat. No. 6,662,193) in view of Call (U.S. Pat. No. 6,154,738).

With this Response Applicants amend claims 2-23, 25-27, 29-32, 34-35 and 37-39, and cancel claims 24, 28, 33 and 26. Reconsideration is respectfully requested.

I.   DRAWING OBJECTIONS

In the Office action dated February 6, 2004, the Examiner objected to the drawings in several respects. As for failing to showing the "test file" recited in claim 4, Applicants amend claim 4 to read "ASCII text file" rather than "ASCII test file" to address the objection.

With regard to the objections to the drawings for allegedly not showing "converting the raw inventory data into a structured query language (SQL) format database..." in claim 11, Applicants respectfully traverse this objection. Claim 1 calls for "converting the raw inventory data into an intermediate database." Figure 2, and in particular step 22, shows "converting files into an intermediate database." Thus, the "converting" step of claim 1 is illustrated in the drawings. Claim 11 merely narrows the "converting" limitation of claim 1 to require the intermediate database to be an SQL database. Thus, Applicants respectfully submit that Figure 2 does in fact show the limitations of claim 11. Applicants further submit that 37 C.F.R. § 1.83 does not require a separate drawing figure for every possible type of intermediate database now in existence, or after-developed, which the claim may cover.

With regard to the objections to the drawings for allegedly not showing the broadcasting, Applicants cancel claim 24. Claim 24 further defined the "transferring" limitations of claims 18, 20, 21 and 23. In spite of the cancellation of claim 24, "transferring" in the claims could include "broadcasting... using

electromagnetic radiation," as well as other by other methods, such as those listed in paragraph [0021] of the present specification.

With regard to the objections to the drawings for allegedly not showing "appending the letters 'WH'", Applicants cancel claims 33 and 36. Claims 33 and 36, however, each further defined a "placing identifying indicia" limitation in claims 29 and 34 respectively. In spite of the cancellation of claims 33 and 36, "placing identifying indicia" in the claims could include "appending the letters 'WH'", as well as other methods.

Finally with respect to the objection to the drawings regarding "writing seat records" and "identifying seat records," Applicants present drawing Figure 4, as discussed below.

II. DRAWING AMENDMENTS

In response to the objections to the drawings in the Office action dated February 6, 2004, Applicants amend all the sheets of drawings to reflect an additional drawing page, and present Figure 4 on new page 4/4. Figure 4 finds support throughout the original specification and drawings, *e.g.,* Figures 1 and 2, and claim 34. No new matter is presented by the addition of Figure 4.

III. AMENDMENTS TO THE SPECIFICATION

With this Response, Applicants amend the specification in several locations. First, Applicants amend paragraphs [0013] and [0014], and add a paragraph just after [0014], to reflect the addition of Figure 4. No new matter is presented in these amendments.

Applicants amend paragraph [0021] to avoid an interpretation from the specification as to what one of ordinary skill may have known prior to reading the pending specification.

Applicants amend paragraph [0034] to make more clear that "seat codes" and "location codes" are referred to interchangeably in the specification. In particular, the specification states:

> A first step of receiving and reconciling physical inventory data preferably starts by scanning **a location code identifying a particular location,** as indicated at block 12. In the context of taking a physical inventory of computing devices, **this location preferably**

refers to a place, within the corporation or within a particular site of a corporation, where computing assets are placed. **The location, which may also be referred to as a seat, uniquely identifies its location.**

Specification Paragraph [0018] (emphasis added). If a "location" may alternatively be referred to as a "seat," a "location code" may alternatively be referred to as a "seat code." Thus, no new matter is presented in these amendments.

Finally, Applicants add a paragraph (which references concurrently added Figure 4) just after paragraph [0034]. The added paragraph finds support throughout the original specification, and in particular in paragraph [0034] and original claim 34. No new matter is presented in this amendment.

IV.   SECTION 112, FIRST PARAGRAPH REJECTIONS

Claims 32-39 stand rejected for allegedly failing to comply with the enablement requirement. With regard to the rejections based on use of the term "seat code," Applicants respectfully traverse this rejection. As quoted above, the specification discusses the use of "location codes," and expressly recites that location codes "identify[] a particular location." Specification Paragraph [0018]. The cited location also expressly states that a location may be referred to as a seat, *id.*, and thus it follows that a location code may be also referred to as a seat code. Applicants therefore respectfully submit that claims that refer to a "seat code" do not suffer enablement problems.

In order only to narrow the issues before the Examiner, Applicants cancel claim 33, thus mooting the enablement rejection of claim 33. Claim 33, however, further defined the "placing identifying indicia on a portion of each record in the asset management database" limitation of claim 29. In spite of the cancellation of claim 33, "placing identifying indicia" in the claims could include "appending the letters 'WH'", as well as other methods.

Finally, Applicants amend claims 34 and 35 to refer to "location codes" rather than "seat records" to address the Examiner's concerns. Use of the term

"location code" finds support throughout the specification (*e.g.* paragraph [0018] and original claim 2), and thus no new matter is added by this amendment.

V.   SECTION 112, SECOND PARAGRAPH REJECTIONS

Claims 8, 9 and 32-39 stand rejected for allegedly failing to fulfill the requirements of 35 U.S.C. § 112, second paragraph. As for the rejections of claims 8 and 9, Applicants amend claims 8 and 9 to remove the offending terminology, thus broadening the claims.

As for the rejection of claims 32-39, Applicants respectfully submit that the arguments presented in section IV above likewise address the Section 112, second paragraph, rejections.

VI.   SECTION 103 REJECTIONS

A.   Claim 1

Claim 1 stands rejected as allegedly obvious over Christensen in view of Call.

Applicants respectfully submit that the combination of Christensen and Call does not teach or fairly suggest all the limitations of claim 1. Christensen appears to be directed to "Methods and Systems for Manipulating a Database Through Portable Data Entry Devices." Christensen's Title. In the Christensen system, portions of the data from a main database are loaded into a portable data entry device, such as a PDA.

> **Once the data has been gleaned from database 240 (FIG. 3)**, the data is stored within data file 246 as represented by block 286. Manipulation module 220 continually or periodically verifies whether data is stored in data file 246, as represented by decision block 290. As such, until data is placed within data file 246, manipulation module 220 continues to answer "no" to decision block 290. Upon insertion of data into data file 246, manipulation module 220, and more specifically data retrieval/request module 252 (FIG. 3) retrieves data from data file 246 as depicted by block 292. ...
> Upon data retrieval, the data is stripped, compressed, formatted, encrypted, and generally converted from a storage data structure to a PDA data structure, as represented by block 294. **In this way, th   data is prepared for transmittal to PDA module 230 (FIG. 3).**

Christensen, Col. 11, lines 6-25 (emphasis added). An inventory using the PDA **modifies the portion of the main database within the PDA**, and then the modified data is reconciled against the main database 240. Christensen, Col. 11, line 65 through Col. 12, line 38. Even if Christensen and Call are properly combined (which Applicants do not admit), the combination teaches only sending a portion of a main database to a portable device, running an inventory, and reconciling the modified portion of the database against the main database.

Claim 1, by contrast, specifically recites, "converting the raw inventory data into an intermediate database; **creating a copy of the asset management database; reconciling records in the intermediate database against corresponding records in the copy of the asset management database ... .**" The Examiner takes the position that the claimed "intermediate database" is the portion of the main database within the PDA, and that "creating a copy of the asset management database" is the copying of the portion of Christensen's database to the PDA. Thus, in the Examiner's view the intermediate database and the copy of the asset management database are the same; however, claim 1 calls for "reconciling ... the intermediate database against ... the copy of the asset management database." The combination of Christensen and Call fails to teach or fairly suggest this limitation.

Based on the forgoing, Applicants respectfully submit that claim 1, and all claims which depend from claim 1 (claims 2-17), should be allowed. Applicants amend claims 2-17 to address wordiness of the preambles. These amendments are not narrowing amendments.

B. Claim 18

Claim 18 stands rejected as allegedly obvious over Christensen in view of Call. Applicants amend claim 18 to make more clear that both the intermediate database and the copy of the asset management database are available on the web server, and the reconciliation takes place as between these two databases, to more clearly define over Christensen which does not reconcile against a copy of the main database 240. The amendments find support in original claim 28, now cancelled.

Claim 18 recites, "transferring the inventory data from the hand held scanner to a web server; converting the inventory data into an intermediate database... ." The Examiner's position appears to be that the portion of the main database 240 on Christensen's PDA is the claimed intermediate database; however, claim 18 clearly requires that the intermediate database is created from inventory data transferred to a web server from a hand held scanner. For this reason alone claim 18 should be allowed.

Claim 18 further recites, "making a copy of the asset management database available on the web server; reconciling records in the intermediate database against corresponding records in the copy of the asset management database on the web server... ." While Christensen may teach copying a portion of the main database 240 to a PDA, the combination of Christensen and Call fails to teach or fairly suggest reconciling records in the intermediate database against a copy of the asset management database on the web server.

Based on the forgoing, Applicants respectfully submit that claim 18, and all claims which depend from claim 18 (claims 19-23, 25-27 and 29-32), should be allowed. Applicants amend claims 19-23, 25-27 and 29-32 to address wordiness of the preambles. These amendments are not narrowing amendments. Further, Applicants amend claim 31 to ensure that 35 U.S.C. § 112, sixth paragraph, is not invoked. Applicants cancel claim 28 as its limitations are now effectively contained in claim 18. The cancellation of claims 24 and 33 is discussed above.

C.   Claim 34

Claim 34 stands rejected as allegedly obvious over Christensen and Call. Claim 34 was amended to address the Section 112 rejections as discussed above.

Claim 34 recites, "placing identifying indicia on each location code in the asset management database; ... writing location codes, associated with assets, to the asset management database without the identifying indicia; and identifying assets not found during the physical inventory in the asset management database by identifying location codes having the identifying indicia." The

combination of Christensen and Call does not teach or fairly suggest such a system.

Based on the forgoing, Applicants respectfully submit that claim 34, and all claims which depend from claim 34 (claims 35 and 37-39) should be allowed. Applicants amend claims 35 and 37-39 to address wordiness of the preambles. These amendments are not narrowing amendments.   The cancellation of claim 36 is discussed above.

VII.   LEXICOGRAPHY

Applicants confirm that they wish for each term to be given its ordinary and customary meaning as understood by one of ordinary skill in the art. In spite of this confirmation, however, Applicants do not waive the right to dispute (during this examination or in future actions) any particular ordinary and customary meaning proffered. As for the Examiner's definition of "database," Webster's II New College Dictionary, 1995, may provide an interpretation broader than that proffered by the Examiner: "A collection of data arranged for ease and speed of retrieval, as by a computer."

VIII.   CONCLUSION

Applicants respectfully request reconsideration and allowance of the pending claims. If the Examiner feels that a telephone conference would expedite the resolution of this case, he is respectfully requested to contact the undersigned.

In the course of the foregoing discussions, Applicants may have at times referred to claim limitations in shorthand fashion, or may have focused on a particular claim element. This discussion should not be interpreted to mean that the other limitations can be ignored or dismissed. The claims must be viewed as a whole, and each limitation of the claims must be considered when determining the patentability of the claims. Moreover, it should be understood that there may be other distinctions between the claims and the prior art which have yet to be raised, but which may be raised in the future.
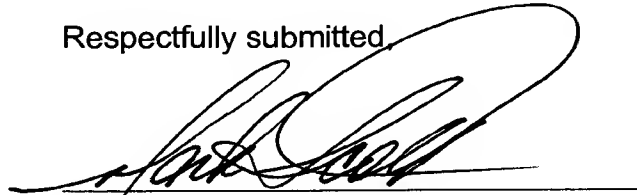
If any fees or time extensions are inadvertently omitted or if any fees have been overpaid, please appropriately charge or credit those fees to Hewlett-

Packard Company Deposit Account Number 08-2025 and enter any time extension(s) necessary to prevent this case from being abandoned.

Applicants respectfully request that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

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